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VIA ECF & EMAIL

Honorable Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007
Torres_NYSDChambers@nysd.uscourts.gov

March 24, 2022

Re: Hall, et al. v. Protoons Inc.; Action No. 21-cv-02043-AT-KHP

Dear Judge Torres:

We are counsel for plaintiffs Orville Hall and Phillip Price, collectively professionally known as “The Showboys” (“Plaintiffs”) in the above-referenced action against defendant Protoons Inc. (“Defendant”). We write with the consent of counsel for Defendant to jointly request a 30-day extension of the time for the parties to file pre-motion letters for leave to file summary judgment motions.

By Order dated January 4, 2022, this case was referred to Magistrate Judge Katharine H. Parker with respect to General Pretrial matters (excluding dispositive pretrial motions). See Doc. No. 42. Under Judge Parker’s direction, additional documents were produced and depositions taken, and fact discovery closed on March 11, 2022. See Doc. No. 50.

Pursuant to paragraph 8 of the Case Management Plan and Scheduling Order entered in this case [Doc. No. 20], a pre-motion letter requesting leave to file a dispositive motion is due on or before March 25, 2022, i.e., within 14 days of the close of fact discovery.

However, the parties have been exploring a potential global resolution of this matter with a third party and a telephonic settlement conference before Judge Parker is scheduled in this matter for May 3, 2022 at 2:00 p.m. See Doc. No. 59. To avoid a potential undue burden on judicial and party resources in preparing and/or reviewing the predicate for a motion that may never need to be filed in the event of settlement, we respectfully request a 30-day extension of the time for the parties to file pre-motion letters with respect to the parties’ requests, if any, to file a motion for summary judgment.

There have been no previous requests for this relief. We thank the Court for its attention to this matter.

GRANTED. By **April 25, 2022**, the parties shall file any pre-motion letters with respect to any requests to file a motion for summary judgment.

Dated: March 28, 2022
New York, New York



ANALISA TORRES
United States District Judge